

JACK P. DICANIO (SBN 138782)
 Jack.DiCanio@skadden.com
 EMILY REITMEIER (SBN 305512)
 Emily.Reitmeier@skadden.com
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 525 University Avenue
 Palo Alto, California 94301
 Telephone: (650) 470-4500
 Facsimile: (650) 470-4570

MATTHEW E. SLOAN (SBN 165165)
 Matthew.Sloan@skadden.com
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
 300 South Grand Avenue, Suite 3400
 Los Angeles, California 90071-3144
 Telephone: (213) 687-5000
 Facsimile: (213) 687-5600

Yan Ge (SBN 236566)
 geyan@us.kwm.com
 KING & WOOD MALLESONS LLP
 535 Middlefield Road, Suite 245
 Menlo Park, CA 94025
 Telephone: (650) 858-1285

Aaron Wolfson (admitted *pro hac vice*)
 KING & WOOD MALLESONS LLP
 aaron.wolfson@us.kwm.com
 500 5th Ave #50
 New York, NY 10036
 Telephone: (212) 319-4755

Attorneys for Defendant
 FUJIAN JINHUA INTEGRATED CIRCUIT CO., LTD.

**IN THE UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

UNITED MICROELECTRONICS
 CORPORATION, et al.,

Defendants.

CASE NO.: 3:18-cr-00465-MMC

**DECLARATION OF MATTHEW E.
 SLOAN IN SUPPORT OF
 DEFENDANT FUJIAN JINHUA
 INTEGRATED CIRCUIT CO., LTD.'S
 MOTION *IN LIMINE* NO. 4**

Judge: The Honorable Maxine M. Chesney
 Trial Date: February 14, 2022

Hearing Date: January 18, 2022
 Hearing Time: 10:00 a.m.

DECLARATION OF MATTHEW E. SLOAN

I, Matthew E. Sloan declare and state as follows:

1. I am a partner at Skadden, Arps, Slate, Meagher & Flom LLP, counsel of record for Defendant Fujian Jinhua Integrated Circuit Co., Ltd. ("Jinhua"). I am an attorney licensed to practice law in the State of California and before this Court. I submit this declaration in support of Jinhua's Motion *In Limine* No. 4 for an Order to Exclude The Forensic Images Of Certain Electronic Devices (the "Motion"). This declaration is based upon my personal knowledge, and, if called to testify, I could and would do so competently as to the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of an English translation dated November 27, 2017 of the Indictment Decision of Taiwan Taichung District Prosecutors Office against JT Ho, Kenny Wang, Leh-Tian Rong, and United Microelectronics Corporation. The translation was provided by the U.S. government when the document was produced to Jinhua.

3. Attached hereto as Exhibit B is a true and correct copy of an English translation of a brief description provided by Le-wei Chen, a prosecutor at the Taichung District Prosecutors Office, on the seizure of 26 electronic devices in February 2017. The translation was provided by the U.S. government when the document was produced to Jinhua.

4. Attached hereto as Exhibit C is a true and correct copy of an English translation of the Explanation Regarding Evidence Transfer of Taichung District Prosecutors' Office of Taiwan on March 16, 2020. The translation was provided by the U.S. government when the document was produced to Jinhua.

5. Attached hereto as Exhibit D is a true and correct copy of (1) Lewei Chen's Certificate of Authenticity of Foreign Public Documents dated March 18, 2021, in Chinese and its English translation; (2) the Certificate With Respect to Seized Items co-signed by Lewei Chen on March 18, 2021, and a forensic officer of the Ministry of Justice Investigation Bureau on March 17, 2021, whose signature is illegible; (3) the Certificate of Authenticity of Forensic Images signed by Lewei Chen and a forensic officer of the Ministry of Justice Investigation Bureau on March 18, 2021, whose signature is illegible. The translations in this exhibit were provided by the U.S. government when it produced the documents to Jinhua.

